

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
KASHNER DAVIDSON SECURITIES CORP.,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Case No. 1:05-cv-11433-JLT
)	
STEVEN MSCISZ, MARK MSCISZ &)	
LYNDA MSCISZ,)	
)	
<i>Defendants.</i>)	
_____)	

NOTICE OF ADDITIONAL GROUNDS FOR REMOVAL

The defendants, Steven Mscisz, Mark Mscisz and Lynda Mscisz (collectively "Customers"), hereby supplement the Notice of Removal filed on July 7, 2005 by stating, as further grounds for removal, that this is a civil action of which the district courts have original jurisdiction founded on claims or rights arising under the Constitution, treaties or laws of the United States – including Sections 7, 9, 10(b), 19(g)(1) and 27 of the Securities Exchange Act of 1934, 15 U.S.C. §§ 78g, 78i, 78j(b), 78s(g), 78aa, implementing regulations promulgated by the Securities and Exchange Commission, and the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1964 – and that it is therefore removable without regard to the citizenship or residence of the parties.

Respectfully submitted,

STEVEN MSCISZ,
MARK MSCISZ & LYNDA MSCISZ,

By their attorney,

/s/ William P. Corbett, Jr.

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Dated: July 12, 2005

Filename: Notice of Additional Grounds for Removal
Directory: C:\Documents and Settings\Bill
Corbett\Desktop\Client Files\Open Files\File #13-004-001 -- Kashner
Davidson v Mscisz
Template: C:\Documents and Settings\Bill Corbett\Application
Data\Microsoft\Templates\Normal.dot
Title: COMMONWEALTH OF MASSACHUSETTS
Subject:
Author: Bill Corbett
Keywords:
Comments:
Creation Date: 7/12/2005 6:16 PM
Change Number: 5
Last Saved On: 7/12/2005 6:27 PM
Last Saved By:
Total Editing Time: 20 Minutes
Last Printed On: 7/12/2005 6:27 PM
As of Last Complete Printing
Number of Pages: 2
Number of Words: 264 (approx.)
Number of Characters: 1,508 (approx.)